

TERRY GODDARD
Attorney General
Firm Bar No. 14000

KELLY A. O'CONNOR
State Bar No. 012832
Assistant Attorney General
1275 West Washington Street
Phoenix, Arizona 85007-2926
Telephone 602-542-3881
crmfraud@azag.gov

Attorneys for Plaintiff

**IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF MARICOPA**

STATE OF ARIZONA,
Plaintiff,

v.

FRANK P. ROMERO, SR.,
Defendant.

Case No: CR2007-005376-001DT

60 SGJ 25

INDICTMENT

CHARGING VIOLATIONS OF:

**COUNT 1: FRAUDULENT SCHEMES
AND ARTIFICES, a Class 2 Felony, in
violation of A.R.S. § 13-2310**

**COUNT 2: ILLEGALLY CONDUCTING
AN ENTERPRISE, a Class 3 Felony, in
violation of A.R.S. § 13-2312(B)**

**COUNT 3: THEFT, a Class 3 Felony, in
violation of A.R.S. § 13-1802(A)**

The Arizona State Grand Jury accuses FRANK P. ROMERO, SR. charging on this 23rd
day of **January, 2007** that in or from Maricopa County, Arizona:

COUNT 1

(FRAUDULENT SCHEMES AND ARTIFICES)

Between approximately May 1, 2004 and November 13, 2006, FRANK ROMERO, pursuant to a scheme or artifice to defraud, knowingly obtained a benefit from the Arizona chapter of the National Association of Field Training Officers ("NAFTO-AZ") by means of fraudulent pretenses, representations, promises, or material omissions, in violation of A.R.S. §§ 13-2310, 13-2301, 13-1802, 13-701, 13-702, 13-702.01 and 13-801.

Said conduct occurred when FRANK ROMERO, a sworn officer of the Tempe Police Department who held the office of Treasurer of NAFTO-AZ, knowingly misappropriated funds from the NAFTO-AZ bank account through ATM card withdrawals and debit card purchases and diverted those funds to his personal use.

COUNT 2

(ILLEGALLY CONDUCTING AN ENTERPRISE)

Between approximately May 1, 2004 and November 13, 2006, FRANK ROMERO, who was employed by or associated with NAFTO-AZ, an enterprise, knowingly conducted the affairs of the enterprise through racketeering, in violation of A.R.S. §§ 13-1802, 13-2312(B), 13-2301(D), 13-701, 13-702, 13-702.01, and 13-801.

Said conduct occurred when FRANK ROMERO, a sworn officer of the Tempe Police Department who held the office of Treasurer of NAFTO-AZ, knowingly misappropriated funds from the NAFTO-AZ bank account through ATM card withdrawals and debit card purchases and diverted those funds to his personal use, as more fully described in Count 3 of this Indictment.

COUNT 3

(THEFT)

Between approximately May 1, 2004 and November 13, 2006, FRANK ROMERO, in his capacity as Treasurer of NAFTO-AZ, without lawful authority, knowingly: (1) controlled property of another with intent to deprive the other person of such property; or (2) converted for

an unauthorized term or use services or property of another that was entrusted to FRANK ROMERO or placed in his possession for a limited, authorized term or use, in violation of A.R.S. §§ 13-1802, 13-1801, 13-701, 13-702, 13-702.01, 13-702.02 and 13-801.

Said conduct occurred when FRANK ROMERO, in his capacity as Treasurer of NAFTAO-AZ, without lawful authority, knowingly misappropriated funds from the NAFTAO-AZ bank account through ATM card withdrawals and debit card purchases and diverted those funds to his personal use. The funds had been entrusted to FRANK ROMERO by NAFTAO-AZ in his capacity as Treasurer for limited purposes and were to be used for activities related to the operations of NAFTAO-AZ. FRANK ROMERO was not authorized to divert the funds to personal use.

The property had an aggregate value of \$3,000.00 or more, but less than \$25,000.00.

Pursuant to A.R.S. § 21-425, the State Grand Jurors find that the offenses described above were committed in MARICOPA County, Arizona.

A True Bill
(A "True Bill")

TERRY GODDARD
ATTORNEY GENERAL
STATE OF ARIZONA

Dated: *January 23, 2007*

Kelly A. O'Connor
KELLY A. O'CONNOR
Assistant Attorney General

Kristen Sushway
Foreperson of the State Grand Jury